

Jason M. Drangel (JMD 7204)
Robert L. Epstein (RE8941)
William C. Wright (WCW 2213)
EPSTEIN DRANGEL LLP
Attorneys for Plaintiffs
60 East 42nd Street, Suite 2410
New York, NY 10165
Tel: 212-292-5390
Fax: 212-292-5391

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X	:	
CJ Products LLC and Ontel Products	:	
Corporation	:	
	:	
Plaintiffs	:	
v.	:	Civ Action No. 11- 0715 (RRM)
	:	
Snuggly Plushez LLC and Berkant Keiskbas	:	
Defendants	:	
	:	
-----X	:	

I, Joseph Li, hereby declare as follows:

1. I am the founder and general manager of Color Rich Limited. I have personal knowledge of the facts hereinafter set forth.
2. I make and submit this affirmation in connection with Plaintiffs' motion for a preliminary injunction.
3. Founded in 1984, Color Rich Limited ("CRL") is one of the most famous soft-toy suppliers in Hong Kong.

4. With an experienced factory based in Pan Yu, China, CRL's product range now covers more than 60% of the world. Export is currently the main business of CRL. Every year, CRL exports millions of plush items all over the world.
5. Since 1995, CRL has attended trade shows in Hong Kong and overseas every year. We met Jennifer Telfer of CJ Products ("CJ") at a U.S. trade show in 2004. Jennifer indicated that she wanted to sell a line of foldable plush toy animal that could also be used by kids as a pillow ("Foldable Plush").
6. CJ purchased an initial order of six (6) different models and 7,000 units in 2004 from us. CJ's Folding Plush product line has expanded to nearly forty (40) animals by 2010.
7. It was our understanding with CJ since 2004 that CJ would own all rights in and to all Foldable Plush developed for the U.S. market.
8. We developed and sold round ball plush toy versions of the animal designs ("Rounds") in the United States to a company called American Mills since 2006. We are still selling the Rounds to American Mills. There are a few other U.S. companies that purchase the Rounds from us.
9. We developed and sold a 32 inch version of the Foldable Plush but as a floor cushion ("Floor Cushion"). The Floor Cushion was also sold to American Mills, but we no longer sell to them. The Floor Cushion is sold to no one else in the United States.
10. We developed and sold play toys for animals incorporating some animal designs in the United States to a company called Multipet International since 2008. We no longer sell the products to Multipet.

11. We sell the Rounds, standard plush animal designs, slippers and other plush products to U.S. customers that incorporate some of the animal designs. CJ knows of this and has no objection.

12. There are a few instances over the years where we have sold a limited number of Foldable Plush to U.S. customers, including, Fiesta and Aroma Home. We no longer sell Foldable Plush to anyone other than CJ in the U.S. market.

13. We understand that a U.K. company called Intalex is selling a foldable plush very similar to the Foldable Plush. We have never sold them goods.

14. We understand that a U.S. company called Kelly Toys is selling a foldable plush similar to the Foldable Plush but with legs. We have never sold them goods.

I declare under the penalty of perjury under the laws of the United States that to the best of my knowledge the foregoing is true and correct.

Dated:

6/8/11

By:

For and on behalf of
COLOR RICH LIMITED

.....
Authorized Signature(s)
Joseph Li